

1 PHILLIP A. TALBERT
United States Attorney
2 KEVIN C. KHASIGIAN
Assistant United States Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700
5 Attorneys for the United States
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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
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11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 APPROXIMATELY \$20,000.00 IN
U.S. CURRENCY,
15 Defendant.
16

2:22-MC-00062-KJM-AC

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant Jose
18 Garcia (“claimant”), appearing *in propria persona*, as follows:

19 1. On or about November 11, 2021, claimant filed a claim in the administrative forfeiture
20 proceeding with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately
21 \$20,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on August 31, 2021.

22 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §
23 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the
24 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim
25 to the defendant currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency
28 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties. That deadline was February 9, 2022.

4. By Stipulation and Order filed February 10, 2022, the parties stipulated to extend to March 11, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

5. By Stipulation and Order filed March 15, 2022, the parties stipulated to extend to April 11, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

6. By Stipulation and Order filed April 26, 2022, the parties stipulated to extend to May 11, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

7. By Stipulation and Order filed May 16, 2022, the parties stipulated to extend to June 10, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

8. By Stipulation and Order filed June 16, 2022, the parties stipulated to extend to August 9, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

9. By Stipulation and Order filed August 17, 2022, the parties stipulated to extend to October 7, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

10. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to January 25, 2023, the time in which the United States is required to file a civil complaint for forfeiture

1 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject
2 to forfeiture.

3 11. Accordingly, the parties agree that the deadline by which the United States shall be required
4 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that
5 the defendant currency is subject to forfeiture shall be extended to January 25, 2023.

6 Dated: 10/05/22

PHILLIP A. TALBERT
United States Attorney

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8 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant United States Attorney

9
10 Dated: 10/05/22

/s/ Jose Garcia
JOSE GARCIA
Potential Claimant
Appearing *in propria persona*

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12 (Signature authorized by phone)

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15 **IT IS SO ORDERED.** The court cautions the parties, however, that in light of the many
16 similar requests previously filed in this case, future requests for extensions of time may be denied absent
17 a showing of good cause.

18 DATED: November 4, 2022.

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21 CHIEF UNITED STATES DISTRICT JUDGE
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